



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 12, 2012

RYAN HECKER, TREASURER
FREEDOMWORKS FOR AMERICA
400 N CAPITOL STREET NW SUITE 765
WASHINGTON, DC 20001

Response Due Date
10/17/2012

IDENTIFICATION NUMBER: C00499020

REFERENCE: JUNE MONTHLY REPORT (05/01/2012 - 05/31/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Schedule A supporting Line 11(a)(i) discloses a refund of a contribution received from Hiroshi Nakanishi. However, it appears that this contribution was not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original contribution or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))
2. Schedule E of your report indicates that your committee may have failed to file and timely file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))
3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent

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expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

4. Schedule E supporting Line 24 of your report discloses negative entries for adjustments of expenditures made during this or previous reporting periods. If the original amount of these expenditures was reported incorrectly, then the original reports should be amended to correct this disclosure. However, if these negative entries represent rebates or refunds, then these transactions should be itemized as receipts on Schedule A supporting Line 15 of the Detailed Summary Page. Please amend your report to correct these discrepancies or provide clarification regarding these transactions. (2 U.S.C. § 434(b)(2) and 11 CFR §104.3(a)(2)(vii))

5. Schedule E supporting Line 24 of your report discloses an independent expenditure(s) on behalf of "Evan Feinberg" for the General Election 2012. The candidate was running for the Republican Party nomination for Pennsylvania House Seat, but lost in the Primary election. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a MEMO entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR 104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditure(s) disclosed for an election that the Candidate is not running in.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action

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will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1169.

Sincerely,



Kevin Fortkiewicz
Campaign Finance Analyst
Reports Analysis Division

Name of Payee	Date	Amount	Purpose	Candidate	Report Received
Arrowhead Graphics Inc.	4/20/12	\$252.75	IE-Nelson- Printing/Shipping	Bill Nelson	5/8/12
Ground Floor LLC	4/23/12	\$475.00	IE-Nelson-Media Buy	Bill Nelson	5/8/12
Rebecca Hagelin Communications	4/23/12	\$6,561.67	IE-Nelson-Media Buy	Bill Nelson	5/8/12
Terra Eclipse, Inc.	4/23/12	\$458.33	IE-Nelson-Media Buy	Bill Nelson	5/8/12

Name of Payee	Date	Amount	Purpose	Candidate
Freedomworks	5/5/12	\$2,603.74	IE-Mourdock-Travel	Richard E Mourdock
Minor, Kristin	5/5/12	\$523.45	IE-Mourdock-Rally Supplies	Richard E Mourdock

Name of Payee	Date	Amount	Purpose	Candidate	Report Received
Freedomworks	5/23/12	\$807.54	IE-Hatch-Travel	Orrin G Hatch	6/1/12
Freedomworks	5/23/12	\$810.63	IE-Hatch-Est. Staff	Orrin G Hatch	6/1/12
Freedomworks	5/24/12	\$84.76	IE-Hatch-Travel	Orrin G Hatch	6/1/12
Action Solutions	5/25/12	\$5,097.68	IE-Hatch-Telemarketing	Orrin G Hatch	6/1/12
Freedomworks	5/25/12	\$133.19	IE-Hatch-Travel	Orrin G Hatch	6/1/12
Mungo LLC	5/25/12	\$2,233.59	IE-Hatch-Door Hangers	Orrin G Hatch	6/1/12
Freedomworks	5/29/12	\$1,161.71	IE-Hatch-Travel	Orrin G Hatch	6/1/12

Missing 48 Hour Report (Schedule E)
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Name of Payee	Date	Amount	Purpose	Candidate
Freedomworks	5/2/12	\$411.93	IE-Cruz-Est. Staff & Overhead	Rafael Edward Ted Cruz
Freedomworks	5/3/12	\$326.11	IE-Cruz-Est. Staff & Overhead	Rafael Edward Ted Cruz
Freedomworks	5/3/12	\$28.23	IE-Cruz-Travel	Rafael Edward Ted Cruz
Freedomworks	5/4/12	\$469.15	IE-Cruz-Est. Staff & Overhead	Rafael Edward Ted Cruz
Freedomworks	5/4/12	\$483.38	IE-Cruz-Travel	Rafael Edward Ted Cruz
Freedomworks	5/7/12	\$160.20	IE-Cruz-Est. Staff & Overhead	Rafael Edward Ted Cruz